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 Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

James Oliver Romine Jr.,

No. 2:16-cv-00604-JJT

Plaintiff,

**MOTION FOR EXTENSION OF TIME
 TO ANSWER OR OTHERWISE
 RESPOND TO THE COMPLAINT
 (First Request)**

vs.

James Nicholas Stanton,

Defendant.

Pursuant to LRCiv. 7.3, Defendant James Nicholas Stanton requests an extension of time for Defendant to answer or otherwise respond to the Complaint. Defendant's current response deadline is April 5, 2016. A 30-day extension is requested up to and including May 5, 2016. This is Defendant's first request.

Defendant is a resident of Mississippi and is still in the process of retaining Arizona counsel. Counsel then requires time to review the complaint, evaluate the alleged libelous statements supporting Plaintiff's 10-count complaint with exhibits requesting \$10,761,000 in damages, and then confer with Defendant regarding an answer or other responsive pleading.

Today undersigned counsel tried to reach *pro se* Plaintiff James Oliver Romine Jr. by telephone to determine Plaintiff's position on this motion, as required under LRCiv. 7.3(b). A message was left on Plaintiff's voice mail regarding the motion and included a phone number and email address for a response. As of the time of this filing Plaintiff has not received a response. Given the approaching deadline undersigned counsel felt it was prudent to file this

1 motion without awaiting a response from Plaintiff so that an order could be entered before the
2 April 5th deadline.

3 A proposed form or order granting this request is submitted herewith.

4 RESPECTFULLY SUBMITTED this 1st day of April, 2016.

5 **HARTMAN TITUS PLC**

6 By: /s/Bradley P. Hartman

7 Bradley P. Hartman

8 John D. Titus

9 7114 E. Stetson Drive, Suite 205

10 Scottsdale, Arizona 85251-3250

11 Attorneys for Defendant

12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on April 1, 2016, I caused the
14 foregoing document to be filed electronically with the
15 Clerk of Court through CM/ECF System for filing and
transmittal of Notice to the following CM/ECF registrant:

16 James Oliver Romine Jr.
17 12494 Ironwood Dr.
18 Yuma, AZ 85367
19 jromine2445@gmail.com
Plaintiff

20 /s/ Bradley P. Hartman
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